

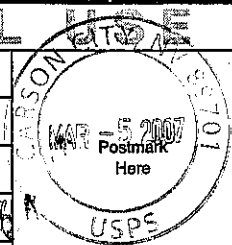
7005 0390 0002 0502 3211

**U.S. Postal Service™**  
**CERTIFIED MAIL™ RECEIPT**  
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**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 1.40



Sent To: OCE Management Group Ltd.  
 Attn: Mr. Randall Jackson  
 Street, Apt. No., or PO Box No.: 4510 W. 63rd Terrace  
 City, State, ZIP+4: Prairie Village, KS 66208

PS Form 3800, June 2002

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

OCE Management Group Ltd.  
 Attn: Mr. Randall Jackson  
 4510 W. 63rd Terrace  
 Prairie Village, KS 66208

**2. Article Number**

(Transfer from service label)

**COMPLETE THIS SECTION ON DELIVERY**

**A. Signature**

X *Denise R Jackson* ☐ Agent ☒ Addressee

**B. Received by (Printed Name)**

*Denise R Jackson*

**C. Date of Delivery**

*3/8/07*

**D. Is delivery address different from item 1? ☐ Yes**

If YES, enter delivery address below: ☐ No

**3. Service Type**

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

**4. Restricted Delivery? (Extra Fee)**

☐ Yes

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

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- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

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- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**IMPORTANT:** Save this receipt and present it when making an inquiry. Internet access to delivery information is not available on mail addressed to APOs and FPOs.

PS Form 3800, June 2002 (Reverse)

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

RECEIVED

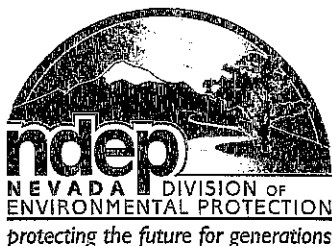
MAR 1 2 2007

ENVIRONMENTAL PROTECTION

3173  
ENVIRONMENTAL PROTECTION  
BUREAU OF CORRECTIVE ACTIONS  
901 S. STEWART ST.  
CARSON CITY, NV 89701  
RETURN SERVICE REQUESTED

MS-BCA H-086





# STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

**BUREAU OF CORRECTIVE ACTIONS**

**P: 775.687.9368 F: 775.687.8335**

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

March 2, 2007

Mr. Randall Jackson  
Health, Safety & Environmental Director  
DCI Management Group Ltd.  
4510 W. 63<sup>rd</sup> Terrace  
Prairie Village, KS 66208

**CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

7005 0390 0002 0502 3211

Subject: **Report on Source Area Soil Assessment**  
Facility: Maryland Square Site, 3661 S. Maryland Parkway  
Las Vegas, Nevada

**Facility ID: H-000086**

Dear Mr. Jackson:

The Nevada Division of Environmental Protection (NDEP) has reviewed the report, *Source Area Soil Assessment*. The soil assessment was conducted to further evaluate the lateral and vertical extent of tetrachloroethylene (PCE) contamination in soils at the former Al Phillips the Cleaners (APTC) in the former Maryland Square Shopping Center.

The soil assessment report stated that "*remedial actions will be based upon the results of this additional soil assessment, a cost/benefit analysis, and an agreed upon site-specific cleanup level (SSCL).*" The report recommends soil vapor extraction (SVE) rather than excavation, based solely on cost. However, insufficient itemized cost data are provided for the proposed remedy of SVE, and assumptions used for the basis of the cost estimate are not clearly described. It appears that costs for SVE are based on the assumption of two years of operation without any analysis of how long it will take to go from 120,000 µg/kg to 100 µg/kg PCE in site soils.

In addition, the report does not address overall effectiveness and timeliness of the proposed SVE remedy. Criteria typically evaluated during remedy selection include effectiveness (can interim action levels be achieved?), timeliness (what is the short-term effectiveness of the remedy?), implementability (will the remedy work at the specific site?), and stakeholder acceptance of the proposed remedy. With regard to effectiveness, the report should consider how well an SVE system will work in an area with a thick layer of well-cemented caliche. (The NDEP notes that the highest concentrations of PCE are contained within the caliche layer.)

## Requirements

The NDEP cannot approve the proposed remedial method without additional information; therefore, the NDEP requests additional clarification on several issues related to the proposed alternative of SVE. The NDEP requires that the timeliness and effectiveness of the proposed remedy, not simply the cost, be evaluated. The NDEP also requires that a detailed cost estimate be provided for the SVE remedy, and that relevant examples of URS's successful employment of SVE systems under similar circumstances be provided for review. Finally, provide calculations for a best estimate of the pounds of PCE that will be extracted per year, then confirm with the Clark County Department of Air Quality what types of emission controls may be required.

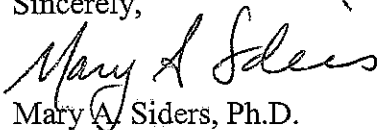


The NDEP requests the following information no later than March 20, 2007:

- Itemized cost estimates for the two alternative remedies: SVE and excavation with offsite disposal.
- Design specifications of the SVE pilot test and proposed duration of test, including an equipment list and data collection requirements.
- Documentation supporting successful implementation of SVE systems in similar environments (heterogeneous soils with contamination in thick caliche layers) for similar levels of contamination (120,000 µg/L PCE), and the time frame for achieving action levels.
- All additional information, analysis and evaluation requested in this letter.

Please contact me at (775) 687-9496 or [msiders@ndep.nv.gov](mailto:msiders@ndep.nv.gov) if you have any questions regarding this letter.

Sincerely,



Mary A. Siders, Ph.D.  
Bureau of Corrective Actions  
Nevada Division of Environmental Protection  
901 S. Stewart Street, Suite 4001  
Carson City, NV 89701

cc: Jim Najima, Chief, Bureau of Corrective Actions, NDEP, Carson City, Nevada 89701  
Greg Lovato, Supervisor, BCA, NDEP, Carson City, NV  
Dante Pistone, NDEP, Carson City, NV  
Richard Queen, President and CEO, DCI Management Group, 51 West 135<sup>th</sup> Street, Kansas City, MO 64145  
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Travis Harmon, Boulevard Mall, 3528 S. Maryland Parkway, Las Vegas, NV 89109  
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Sonja A. Inglin, Jenkins & Gilchrist, LLP, 12100 Wilshire Boulevard, 15<sup>th</sup> Floor, Los Angeles, CA 90025  
Dennis Campbell, Southern Nevada Health District, PO Box 3902, Las Vegas, NV 89127  
Joseph F. Leising, Southern Nevada Water Authority, 1900 E. Flamingo Rd., Suite 255, Las Vegas, NV 89119  
Rob Mrowka, Planning Manager, Clark County Division of Environmental Planning, 500 S. Grand Central Pkwy, 1<sup>st</sup> floor, P.O. Box 551741, Las Vegas, NV 89155-1741  
Mark Friedman, General Counsel, American Golf Corporation, 2951 28<sup>th</sup> Street, Santa Monica, CA 90405  
Malcolm Weiss, Jeffer, Mangels, Butler & Marmaro LLP, 1900 Avenue of the Stars, 7<sup>th</sup> Floor, Los Angeles, CA 90067 of the Stars, 7<sup>th</sup> Floor, Los Angeles, CA 90067

**ERRATUM:**

Note that there is an error in the third bullet on the second page of the NDEP letter. The concentration of PCE in soil was 120,000 µg/kg, *not* 120,000 µg/L.